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January 8, 2024

Via ECF

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001*, 03-md-1570 (GBD) (SN)

Dear Judge Netburn:

I write on behalf of Defendant Kingdom of Saudi Arabia (“Saudi Arabia”) to request an extension of time for Saudi Arabia to file its reply in support of its renewed motion to dismiss, ECF No. 9368. Saudi Arabia respectfully requests that the January 31, 2024 deadline set by the Court’s order at ECF No. 9448 be extended by one month, to March 4, 2024. Plaintiffs have indicated that they consent to this request.

Saudi Arabia also requests additional time to complete the process of reviewing Plaintiffs’ opposition filings for proposed redactions. The parties originally contemplated that initial redactions and sealing proposals would be made 30 days after each filing. On December 20, 2023, Plaintiffs filed an opposition brief supported by an Averment of Facts that is 563 pages long and contains 2,118 paragraphs, along with five new declarations. ECF No. 9488-1. Saudi Arabia has filed a letter-motion to strike portions of the Averment and the declarations, ECF No. 9500, which is fully briefed. Even if that motion is granted, however, Saudi Arabia will need additional time to propose redactions, especially since it will not be clear what filings will remain in the record until the motion to strike is resolved. Accordingly, Saudi Arabia proposes that its review period be extended until 30 days after the later of (1) the Court’s order resolving its motion to strike or (2) the due date for Saudi Arabia’s reply. Plaintiffs have indicated that they oppose this request.

Dallah Avco requests to be kept on the same schedule as Saudi Arabia.

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Respectfully submitted,

/s/ Michael K. Kellogg

Michael K. Kellogg
Counsel for the Kingdom of Saudi Arabia

cc: All MDL Counsel of Record (via ECF)